



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



479968

REPLY TO THE ATTENTION OF:

HSR-6J

SEP 18 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

September 18, 1995

Mr. R. Lennie Scott, P.E.
Director, Health, Environment, and Safety
Elkhart Area Site
Bayer Corporation
1884 Miles Avenue
Elkhart, Indiana 46515-0040

Dear Mr. Scott:

Pursuant to discussions held during our meeting on 29 August 1995, the United States Environmental Protection Agency (U.S. EPA) is requesting access to investigate potential borrow areas adjacent to the Himco Dump Superfund Site for purposes of estimating costs associated with the remedy, and finalizing the remedial design. More specifically, the potential borrow areas are located just north and west of the quarry pond as shown in Attachment No. 1. The land, which is owned by Bayer Corporation, is currently farmed.

U.S. EPA and the U.S. Army Corps of Engineers (USACE) propose to evaluate the potential to use the aforementioned property as a borrow source for a portion of the earthen materials required to construct the final cover system for the Himco Dump Superfund Site. Use of on-site borrow sources will result in significantly lower material costs as compared to off-site borrow sources. Preliminary estimates indicate the cost of on-site borrow material at around \$1.00 per cubic yard whereas off-site borrow ranged from \$6.50 to \$9.50 per cubic yard depending on the material type. As indicated by these figures, there can be a substantial cost savings if on-site material is utilized to construct the cover system.

The exploratory work will consist of trenching several areas on the sites to evaluate stratigraphy, depth to ground water, and to collect soil samples. The trench excavations will be back-filled immediately after completion of sampling and logging activities. Field work would commence as soon as possible after crops have been harvested.

If volume and types of materials are found to be suitable, the final design will provide for excavation of on-site borrow in a manner that will allow for the development of wildlife habitat in the form of shallow ponds and wetland areas. To accomplish this, material would be removed to a depth that is equal to and/or



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several feet below the existing ground water table. The depth of the excavation will vary across the sites to provide an irregular shoreline and island areas. The ponds will provide shallow water habitat areas and will likely be connected to the deep water habitat provided by the quarry pond. At the completion of the project, the borrow sites will consist of a series of interconnected ponds/lakes. Since the ponds/lakes will be ground water fed, fluctuations in ground water levels will result in varying pond/lake water levels. To the extent that construction activities affect jurisdictional wetlands, these areas could be used to offset such losses.

USACE has utilized borrow areas to construct wildlife habitat of this type for other projects. Enclosed as Attachment No. 2 is an aerial photograph showing the final disposition of the borrow area for a final landfill cover project in Ohio.

In summary, U.S. EPA and USACE propose to utilize on-site borrow sources to the greatest extent possible in order to minimize material costs. The borrow areas could be developed into wetland wildlife habitat, and applied toward any needed mitigation. U.S. EPA requires access to the proposed borrow areas in the near future to determine availability and suitability of materials. It is understood that by granting access for investigation purposes, Bayer Corporation is not agreeing a priori to the use of this property for borrow purposes. U.S. EPA merely wishes to design the most cost-effective remedy possible.

In consideration of the fact that Bayer Corp. and U.S. EPA have a current access agreement which potentially includes access to the aforementioned property, U.S. EPA suggests Bayer provide a letter clearly extending such access through that agreement. This would appear to be the simplest approach. Please provide a response within 21 days of receipt of this letter. If you have any questions, please call me at 312/353-6083, or Larry Johnson, Assistant Regional Counsel, at 312/886-6609.

Sincerely yours,

Wm. Turpin Ballard, CHMM
Remedial Project Manager

Attachments

cc: Larry Johnson, CS-29A
Greg Herring, USACE



Figure 6. Himco Dump; May 8, 1986. Approximate scale, 1 inch equals 500 feet.



Final Disposition of Borrow Area. New Lyme Landfill, Ohio.